PFE ORIGINAL

Fw: Cabot Challenges EPA's Dimock Water Data

Terri-A White

to:

Garvin.Shawn, Betsaida Alcantara

01/31/2012 03:49 PM

Cc

"Bob Sussman", "William Early", "Mick Kulik", "Jennie Saxe", "Ron Borsellino", "Dennis

Carney"

Hide Details

From: Terri-A White/R3/USEPA/US Sort List...

To: Garvin.Shawn@epamail.epa.gov, "Betsaida Alcantara" <alcantara.betsaida@epa.gov>

Cc: "Bob Sussman" <Sussman.Bob@epamail.epa.gov>, "William Early"

<Early.William@epamail.epa.gov>, "Mick Kulik" <kulik.michael@epa.gov>, "Jennie-Saxe"----

<Saxe.Jennie@epamail.epa.gov>, "Ron Borsellino" <Borsellino.Ron@epamail.epa.gov>, "Dennis Carney" <Carney.Dennis@epamail.epa.gov>

1 Attachment

Cabot Response to EPA Water Data FINAL 1-31.pt

FYI.

Sent by EPA Wireless E-Mail Services

From: Laura Legere [llegere@timesshamrock.com]

Sent: 01/31/2012 03:09 PM EST To: Terri-A White; David Sternberg

Subject: Cabot Challenges EPA's Dimock Water Dat

Ex. 5 - Deliberative

SDMS DociD

Hi Terri.

Cabot has released a response to the EPA's testing and temporary water deliveries in Dimock in which

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the company says the data points cited by the agency in its action memo "are out of context, not representative of the volumes of data collected, and in some cases, did not originate from these residences' water wells at all."

The specific arguments are attached in the full memo.

Would you like to respond to Cabot's letter? I would need something by the end of the day.

Thanks.

Laura Legere
Staff Writer
Scranton Times-Tribune
570-348-9100 x 5184
llegere@timesshamrock.com

----- Forwarded message -----

From: George Stark < george.stark@cabotog.com >

Date: Tue, Jan 31, 2012 at 2:47 PM

Subject: Cabot Challenges EPA's Dimock Water Data

To: "llegere@timesshamrock.com" < llegere@timesshamrock.com>

Laura,

Below is an executive summary of the Cabot response to the EPA's January 2012 position on water delivery in Dimock. Attached is the full 6-page response doc. All of it will be released and posted later today.

As you are aware Cabot disagrees with EPA's decision to conduct an extensive investigation and to provide water to a select group of landowners on the grounds there is no evidence the well water in question poses a threat to human health. EPA's data points are out of context, not representative of the volumes of data collected, and in some cases, did not originate from these residences' water wells at all. We desire to set the record straight on the relevance of the data and where it came from.

These distortions of fact are summarized below:

- * The U.S. EPA disregarded more recent data that better demonstrates the current conditions of the water wells. Instead, they opted to utilize data from several years ago, including one from November 2008. Less than a handful of the data utilized was collected in 2011.
- * NONE of the data points selected by the U.S. EPA show concentrations for substances (including arsenic, manganese, sodium, glycols and DEHP) in the residences' well water that exceed the Primary Maximum Contaminant Levels set by the U.S. Government.
- * The water sample cited by the U.S. EPA to represent the maximum concentration of arsenic in the Carter water well was NOT taken from the residence's water well it was from a sample of the Montrose area public water supply from Pennsylvania American Water. All other arsenic values for the Carter water well fall below the PMCL.
- * Many of the data points selected are taken out of context:
- o The sodium point for the Sautner well water was taken from a post-treatment water sample after having gone through a water softener, which reduces water hardness by replacing calcium and magnesium with sodium and thereby raising the overall sodium concentration. A review of the data

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shows, as expected, that all of the pre-treatment water samples have sodium concentrations 3-4 times lower than the post-treatment water.

- o The manganese point for the Sautner well water is nearly three years old and was only one of two samples to be above the Secondary Contaminant Level. The other 43 water samples collected were below this level. Realize there is not PMCL for manganese, only a SMCL.
- o The sodium point for the Nolan Ely water well was collected 18 months ago and is inconsistent with data collected since September 2010.
- * The Montrose area public water supplied by Pennsylvania American water (which the EPA is currently providing to these residences) contains sodium concentrations well above what the majority of the landowners have in their own water wells.
- * There is neither a Primary Maximum Contaminant Level nor a Secondary Contaminant Level established for sodium.
- * The manganese levels in the four water wells fall within the levels of naturally occurring manganese observed throughout the Susquehanna County area.
- The glycol levels are well below the ATSDR advisory level referenced by the U.S. EPA.

Please feel free to call if you have additional questions...

George Stark Director, External Affairs Cabot Oil & Gas Corporation (412) 249-3909

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Cabot Oil & Gas Corporation

U.S. EPA's January 2012 Position on Water Delivery

Cabot is steadfastly committed to constant improvement of our operations, environmental stewardship, collaboration with state regulators, and compliance with all applicable federal, state and local laws. Our track record in Dimock and in all areas in Pennsylvania in which we operate demonstrates that we are always responsive to recommendations and requests to protect both the health of the communities in which we operate and the environment.

In October 2011, Cabot provided water sampling data to the Pennsylvania Department of Environmental Protection (PADEP) following sampling events conducted in Dimock Township. The data was also placed on the Cabot website at www.cabotog.com. Based on testing of a range of constituents, PADEP concluded that Cabot met its obligations under the consent order and settlement agreement. After reviewing the data, on December 2, the EPA concluded "the data does not indicate that the well water presents an immediate health threat to user". In January, with no additional credible data, the EPA reversed their decision and came to a different conclusion from PADEP by using data points that do not accurately represent the water quality and are inconsistent with the overall body of data collected at each residence by Cabot, PADEP, and other independent parties. PADEP has been critical of EPA's subsequent intervention.

Most recently, in a statement dated January 20, 2012, EPA announced its belief that four Dimock residences should have replacement water delivered due to Agency concerns. Cabot has reexamined the data relevant to EPA's January 2012 statement. Based on this reexamination, it appears that EPA selectively chose data on substances it was concerned about in order to reach a result it had predetermined. EPA chose to include specific data points without adequate knowledge or consideration of where or why the samples were collected, when they were taken, or the naturally occurring background levels for those substances throughout the Susquehanna County area. The end result is an unwarranted investigation and unnecessary delivery of water.

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